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*Counsel for Raymond Thompson***UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

Case No.: BK-S-19-14796-MKN

GYPSUM RESOURCES MATERIALS, LLC,

Jointly Administer with Case No. BK-S-19-14799

☒ Affects GYPSUM RESOURCES
MATERIALS, LLC

Chapter 11

☐ Affects GYPSUM RESOURCES, LLC**STIPULATION TO RESOLVE
MOVANT'S RELIEF FROM
DEBTOR'S AUTOMATIC STAY AND
VACATE MOVANT'S MOTION FOR
RELIEF FROM THE AUTOMATIC
STAY**☐ Affects all Debtors

Hearing Date: January 8, 2020

Hearing Time: 9:30 a.m.

Debtor.

Debtor GYPSUM RESOURCES MATERIALS, LLC ("Debtor"), the above-captioned debtor and debtor in possession and creditor Raymond Thompson ("Movant"), through their respective counsel, hereby stipulate, agree, and jointly move the Court as follows to resolve Movant's *Motion for Relief from Automatic Stay* ("Motion"), at ECF No. 412, and vacate said Motion. The parties request that the Court, finding the resolution fair and equitable, enter the order as agreed upon by the parties and provided below.

WHEREAS:

1. On December 3, 2019, Movant sought relief from the automatic stay to pursue certain personal injury claims against Debtor.

2. Debtor and Movant, through their respective counsel, have negotiated in good faith and have agreed upon the terms that follow.

NOW, THEREFORE, IT IS AGREED THAT:

3. Movant is entitled to relief from the automatic stay in the above-captioned bankruptcy case to pursue a lawsuit against Debtor and its employee, Smith, and proceed until a final resolution is reached, including but not limited to the entry of a judgment;

4. Collections against Debtor on any final resolution of such lawsuit will be limited to Debtor's insurance proceeds, and, if Debtor's Case remains pending, distributions made to unsecured creditors through Debtor's Case.

5. Movant's relief from the automatic stay should be deemed effective immediately and without delay;

6. This Stipulation resolves Movant's *Motion for Relief from Automatic Stay*, ECF No. 412, currently scheduled for January 8, 2020, at 9:30 a.m. and such Motion should be vacated and taken off calendar.

DATED this day of December, 2019.

DATED this day of December, 2019.

ANDERSEN LAW FIRM, LTD.

FOX ROTHSCHILD LLP

/s/ Ryan A. Andersen

/s/

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